

(3/22/2010) Maria NEYRA - RE: protective order

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From: "Stellmach, William (USANYS)" <William.Stellmach@usdoj.gov>
To: "Maria NEYRA" <MNEYRA@royblack.com>
CC: "Jason Anthony" <AnthonyJ@SEC.GOV>, "Braun, Daniel (USANYS)" <Daniel.Bra...
Date: 9/16/2009 1:48 PM
Subject: RE: protective order

Our problem isn't giving the Fed discovery to lawyers at Greenberg, if they are representing your client. If there are specific Greenberg lawyers that should have access, please just identify them and we would be happy to include them in the protective order.

But that still leaves the issue of whether there are Greenberg lawyers simultaneously engaged in the representation of both your client and his father. We don't want to have a Curcio either, but it may become unavoidable if there's a potential conflict due to simultaneous representation.

Please advise.

Thanks.

-----Original Message-----

From: Maria NEYRA [mailto:MNEYRA@royblack.com]
Sent: Wednesday, September 16, 2009 1:31 PM
To: Stellmach, William (USANYS)
Cc: Jason Anthony; Braun, Daniel (USANYS)
Subject: RE: protective order

Bill: We certainly didn't intend to create any additional issues or contemplate the need for a Curcio hearing. We were simply being overinclusive and even added Scott Srebnick and local counsel Frankie Rebollo. Why don't we simply limit disclosure of the of the Federal Reserve docs. to Black, Srebnick, Korsnpan & Stumpf, P.A. Does that get us the Fed. Reserve discovery?

Thanks again.

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